

1 PHILLIP A. TALBERT  
United States Attorney  
2 EMILIA P. E. MORRIS  
Assistant United States Attorney  
3 2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
4 Telephone: (559) 497-4000  
Facsimile: (559) 497-4099  
5

BRIAN M. BOYNTON  
6 Principal Deputy Assistant Attorney General  
JAMIE ANN YAVELBERG  
7 COLIN M. HUNTLEY  
JARED S. WIESNER  
8 Department of Justice  
Civil Division - Fraud Section  
9 Commercial Litigation Branch  
U.S. Department of Justice  
10 175 N Street, NE  
Washington, D.C. 20002  
11 Telephone: (202) 353-1274  
Facsimile: (202) 541-0280  
12

Attorneys for United States of America  
13

14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA  
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17 UNITED STATES, *ex rel.*, BELL HILL, LLC,

18 Plaintiff,

19 v.

20 JOHN SEASHOLTZ; SWEETWOOD FARM  
CO. LLC; MENDOTA LAND COMPANY;  
21 SWEETWOOD FARM INC; SEASHOLTZ  
CO. LLC; and BANK OF THE WEST,  
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Defendants.  
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CASE NO. 1:20-CV-00942-ADA-BAM

**JOINT STIPULATION OF VOLUNTARY  
DISMISSAL BY THE UNITED STATES AND  
RELATOR**

Pursuant to Federal Rules of Civil Procedure Rule 41(a), the United States of America, and Relator Bell Hill, LLC (“Relator”), hereby stipulate that the above-captioned action shall be dismissed pursuant to the terms of the attached settlement agreement (the “Settlement Agreement”) between Relator, the United States, and Defendants John Seasholtz, Sweetwood Farm Co. LLC, Mendota Land Company, Sweetwood Farm Inc., and Seasholtz Co. LLC (“Seasholtz Defendants”) with an effective date of December 21, 2022. The United States previously declined to intervene as to claims against Defendant Bank of the West. (Doc. 25.)

The United States and Relator accordingly stipulate to the entry of the attached proposed Order dismissing the False Claims Act claims asserted in this action on behalf of the United States. The dismissal shall be with prejudice as to the Relator. The claims against the Seasholtz Defendants shall be dismissed with prejudice as to the United States with respect to the Covered Conduct as defined in the Settlement Agreement, and otherwise without prejudice. The claims against Bank of the West shall be dismissed without prejudice to the United States.

A proposed order accompanies this notice.

Dated: July 11, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ Emilia P. E. Morris  
EMILIA P. E. MORRIS  
Assistant United States Attorney

Dated: July 11, 2023

/s/ Justin Berger  
JUSTIN BERGER  
Cotchett, Pitre & McCarthy, LLP  
Attorney for Relator

**CERTIFICATE OF SERVICE BY E-MAIL**

The undersigned hereby certifies that she is an employee working in the United States Attorney's Office for the Eastern District of California and is a person of such age and discretion as to be competent to serve papers.

That on July 11, 2023, she served a copy of

**JOINT STIPULATION OF VOLUNTARY DISMISSAL BY THE UNITED STATES AND  
RELATOR**

via email only to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known email address(es).

**Addressee(s):**

Justin T. Berger  
[jberger@cpmlegal.com](mailto:jberger@cpmlegal.com)

/s/ Marcela Vasquez  
Marcela Vasquez